

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD.,

Debtor.

Chapter 11

Case No. 22-11068 (JTD)
(Jointly Administered)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, on January 21, 2025, Mr. Hyung Cheol Lim (“**Lim**”), his wholly owned entities, Aimed, Inc. (“**Aimed**”) and Blocore Pte., Ltd. (“**Blocore**”), Mr. Ji Woong Choi (“**Choi**”) and his wholly-owned entity, Mosaic Co. Ltd. (“**Mosaic**” and together with Lim, Aimed, Blocore, and Choi, collectively, the “**Principals**”), by and through their attorneys, Venable LLP, filed their *Motion For an Order, Pursuant to Rules 3001 and 3020(d) of the Federal Rules of Bankruptcy Procedure and 11 U.S.C. §§ 105(a) and 1142(b), For Leave to Amend Proof of Claim No. 87144 to Correct Claimant’s Name* (the “**Motion**”) in the chapter 11 cases of the above-captioned debtors and debtors-in-possession (collectively, the “**Debtors**”). The Motion seeks an order granting the Principals leave to amend Proof of Claim No. 87144 (the “**Proof of Claim**”) to correctly identify the Principals, rather than the agent, as the “Original Customer” and Holder (as those terms are defined in the Debtors’ Second Amended Joint Plan of Reorganization) of the claim evidenced by the Proof of Claim.

PLEASE TAKE FURTHER NOTICE that, objections, if any, to the Motion must in writing, must be filed with the Clerk of the Bankruptcy Court on or before **February 7, 2025 at 4:00 p.m. (ET)** (the “**Objection Deadline**”) and must be served on undersigned counsel to the Principals so as to be received by them on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion will be held on February 27, 2025 at 10:00 a.m. at the United States Bankruptcy Court for the District of Delaware, 824 N. Market St., 5th Floor, Courtroom 5, Wilmington, Delaware 19801, before the Honorable Chief Judge John T. Dorsey.

PLEASE TAKE FURTHER NOTICE that if no objections are timely or properly filed or served in accordance with this notice, the Court may grant the relief requested in the Motion without further notice or hearing.

Dated: January 21, 2025
Wilmington, Delaware

VENABLE LLP

/s/ Daniel A. O'Brien

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*Counsel for Mr. Hyung Cheol Lim, Aimed,
Inc., Blocore Pte., Ltd., Mr. Ji Woong Choi,
Mosaic Co., Ltd.*